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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY **DIVISION OF LEGAL COUNSEL** 2200 CHURCHILL ROAD, P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 TELEPHONE (217)782-5544+FACSIMILE (217)782-9807

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COMMENTS: Letter from Chemistro 1 c: Stag
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P.O. **Box 67** • Hortford, IL 62048 618-254-4381 • 800-444-5564

November 19, 1997

Mr. Chris Cahnovsky
Illinois Environmental Protection Agency
Bureau of Land
2009 Mall Street
Collinsville, IL 62234

RE: 1198010003 - Madison County

Chemetco, Inc.

Dear Mr. Cahnovsky:

As you requested during your October 31, 1997 inspection, Chemetco, Inc. is providing an explanation how slag fines are used as a substitute for sand in the production process of copper.

Slag fines are used to reduce the temperature of the metal bath. The lower furnace temperature decreases metal loss to fume reducing airborne emissions and enhancing metal recovery. Approximately 45,000 lbs of fines are added to the bath on a daily basis. Chemetco produces on the average 60,000 lbs of slag fines a day. The addition of the slag fines to the bath, replaces a small portion of white sand previously purchased by Chemetco. However, since Chemetco uses white sand in other applications and the usage of white sand varies from day to day we cannot provide at this time documentation of a reduction in white sand usage.

Chemetoo currently generates approximately 60,000 lbs of fines per day. The slag fines when generated at the slag granulation plant are deposited onto a concrete pad at the rear of the granulation plant. The fines are transported by loader and temporarily stored within the fines building for use in the furnace. Chemetoo believes they will be able to use 75% of the slag fines generated in a calendar year.